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Attorneys for Lead Plaintiff Teachers' Retirement
System of Oklahoma and Lead Counsel to the Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re CONNETICS SECURITIES
LITIGATION.

Case No. 07-CV-02940 SI

This Document Relates To:

ALL ACTIONS.

**STIPULATION AND [PROPOSED]
ORDER REGARDING BRIEFING
SCHEDULE**

1 This Stipulation is entered into by and among Lead Plaintiff Teachers' Retirement
2 System of Oklahoma ("Plaintiff") and defendants Connetics Corp. ("Connetics"), Thomas G.
3 Wiggans, C. Gregory Vontz, John Higgins, Lincoln Krochmal, Alexander J. Yaroshinsky and
4 Victor E. Zak ("Defendants").

5 WHEREAS, on January 29, 2008, the Court issued an Order granting Defendants'
6 motion to dismiss and motion to strike Plaintiff's Amended Consolidated Complaint and
7 granting leave to file an amended complaint by February 22, 2008.

8 WHEREAS, Plaintiff intends to file a second amended consolidated complaint.

9 WHEREAS, Defendants intend to move to dismiss the second amended consolidated
10 complaint for failure to state a claim; and

11 WHEREAS, the parties believe that the resources of the Court and the parties are best
12 conserved, and the interests of judicial economy are best served, by stipulating to a schedule for
13 Plaintiff's second amended consolidated complaint and Defendants' motions to dismiss;

14 IT IS HEREBY STIPULATED AND AGREED, pursuant to Northern District of
15 California Civil Local Rule 6-1, by and between the undersigned counsel for the parties, as
16 follows:

- 17 1. Plaintiff will file and serve a second amended consolidated complaint on or before
18 March 14, 2008.
- 19 2. Defendants will file and serve their respective motions to dismiss the second
20 amended consolidated complaint for failure to state a claim and any other
21 responsive pleadings on or before May 2, 2008.
- 22 3. Plaintiff will file and serve its opposition to Defendants' motions to dismiss on or
23 before June 20, 2008.
- 24 4. Defendants will file and serve their respective replies in support of their motions
25 to dismiss and any other responsive pleadings on or before July 18, 2008.
- 26 5. The parties request that the Court schedule a hearing on Defendants' motions to
27 dismiss on the earliest available date. August 15, 2008 at 9 a.m.
- 28

1 IT IS FURTHER STIPULATED, pursuant to Northern District of California Civil Local
2 Rule 6-1, by and between the undersigned counsel for the parties, that the parties may enter into
3 and submit a further appropriate stipulation amending this filing.
4

5 Dated: February 12, 2008

Respectfully submitted,

6 BERNSTEIN LITOWITZ BERGER
7 & GROSSMANN LLP

8 By: /s David R. Stickney

9
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15 *Attorneys for Lead Plaintiff Teachers' Retirement*
16 *System of Oklahoma and Lead Counsel to the Class*

17 Dated: February 12, 2008

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24 *Attorneys for Defendants Connetics Corp., Thomas*
25 *G. Wiggans, C. Gregory Vontz, John Higgins, and*
26 *Lincoln Krochmal*
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28

1 Dated: February 12, 2008

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*Attorneys for Defendant Alexander J.
Yaroshinsky*

10 Dated: February 12, 2008

/s Victor E. Zak

11 VICTOR E. ZAK
12 Pro Se Defendant
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16 Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest
17 under penalty of perjury that concurrence in the filing of the document has been obtained from
18 Christopher J. Steskal, Alysson Russell Snow and Victor Zak.

19 * * *

20 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

21 DATED: _____ 2008



22 THE HONORABLE SUSAN ILLSTON
23 UNITED STATES DISTRICT JUDGE
24
25
26
27
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CERTIFICATE OF SERVICE

I, Brandy M. Roberts, do hereby certify that on this 12th day of February, 2008, true and correct copies of the foregoing

STIPULATION AND [PROPOSED] ORDER
REGARDING BRIEFING SCHEDULE

were filed electronically. Those attorneys who are registered with the Electronic Case Filing ("ECF") System may access this filing through the Court's system, and notice of this filing will be sent to the parties by operation of the Court's ECF System. Attorneys not registered with the Court's ECF system will be duly and properly served via Federal Express or U.S. Mail (as indicated on the attached Service List), in accordance with the Federal Rules of Civil Procedure and the Court's Local Rules.

/s/Brandy M. Roberts

Brandy M. Roberts

Service List

In re CONNETICS SECURITIES LITIGATION

Case No.: 07-02940

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